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October 21, 2014

Miriam Barcellona Ingenito, Acting Director
Department of Toxic Substances Control
1001 I Street
P.O. Box 806
Sacramento, CA 95812-0806

**RE: Comments on Safer Consumer Products DRAFT Priority
Product Work Plan**

Dear Director Ingenito:

Susanne Gallivan
Environmental Program
Manager
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Thank you for the opportunity to review and comment on the California Department of Toxic Substances Control's (Department or DTSC) Safer Consumer Products (SCP) DRAFT Priority Product Work Plan published in September 2014.

Hewlett-Packard (HP) would like to offer the following feedback on the draft:

- 1) We would like to have visibility to the supporting information and/or research that informed the Department's decisions to include the various product categories and potential candidate chemicals listed in the Draft Work Plan.
- 2) The category description of Section 4.6 for Office Machinery (Consumable Products) would be

significantly improved if the scope were clarified to exclude industrial large scale printers (e.g., web printing presses¹).

- 3) While we would not agree that inks and toners in genuine OEM (original equipment manufacturer) original and replacement print cartridges have, "potential for widespread adverse impact in California,"² should the Department determine these will be included in the scope of the final Priority Products Work Plan, we would suggest adding clarifying text to ensure that all original cartridges (i.e., cartridges packaged with the printer) and all replacement cartridges, whether OEM or not, are included in the listing.
- 4) To help clarify the Department's specific interest and intent, we suggest replacing the term "Specialty Paper" in Section 4.6 with the designation of "Paper and Paper Products" along with the relevant sub-category(ies) defined by the U.S. Environmental Protection Agency, under the U.S. Comprehensive Procurement Guidelines (CPG)³:
- 5) Although the Draft Work Plan is very preliminary compared to a Priority Product profile, even at this early stage we recommend the Work Plan clearly delineate refined chemical class or group identifications that are also harmonized with existing regulatory frameworks of SCP-listed chemicals of concern if these

¹ <http://www8.hp.com/us/en/commercial-printers/web-presses/overview.html>

² Section 5.O, SCP DRAFT Priority Product Work Plan

³

<http://www.epa.gov/waste/conserve/tools/cpg/products/paperproducts.htm>

frameworks meet a similar intent to the SCP program. For example, in Section 4.6, "azo-dyes" are included in the list of potential candidate chemicals for the category Office Machinery (Consumable Products). "Azo-dyes" are soluble and primarily used in a liquid state but this term is sometimes used loosely to refer to azo-pigments which are primarily used in a solid state. An example of an existing regulatory framework that covers azo-colorants (dyes and pigments) is EU REACH Where no relevant regulatory criteria currently exist for a candidate chemical, we would recommend harmonizing with the relevant criteria of well-respected, credible and broadly used eco-labels, such as the consumables criteria of the German Blue Angel for printing systems, or the ITI-ECO declaration in the Scandinavian countries.

HP appreciates the opportunity to comment on the Draft Priority Product Work Plan and we look forward to continue working with the Department on this valuable program.

Regards,

Susanne Gallivan
Hewlett-Packard
Environmental Compliance Program Manager

Cc: Jennifer Morris, HP
Helen Holder, HP
Barbara Hanley, HP
Jon Dickinson, HP